U.S. Department of Labor

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DIRECTIVE:	REGION 2 PRH SUPPLEMENT NO. 6.3R1
TO	ALL REGION 2 CENTER DIRECTORS
	ALL REGION 2 CENTER OPERATORS
	ALL REGION 2 AGENCY CENTER OPERATORS
	ALL REGION 2 OUTREACH & ADMISSIONS CONTRACTS
FROM:	LYNN INTREPIDI
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SUBJECT: STUDENT RECORDS MANAGEMENT

- **1. Purpose:** To establish procedures for a Region-wide uniform records system that meets the requirements of the PRH and incorporates the use of the Job Corps CDSS Suite of Applications.
- **2.** <u>Action</u>: Center Directors must review all Standard/Center Operating Procedures (SOP/COP) pertaining to student records for concurrence with the requirements listed in this supplement. Revised policies must be submitted to the Regional Office by December 31, 2003. Procedures must also include the design layout/structure the center will utilize for the student folders.

It is expected that center's will utilize the upcoming Winter Break as a forum to provide training to all staff on the revised records system.

3. Policy: The implementation of the CDSS Suite of Applications has resulted in significant changes to our accessibility to student information and records. These changes have allowed for greater flexibility in terms of immediate access to student data. Information can now be accessed at any time by virtually all Job Corps staff.

Information must include current accounts of the student's functioning, including educational and vocational training, counseling, residential activities, health history, and administrative records. Student records can be divided into 5 different areas. These include:

- Career Preparation and Career Development (Chapters 2 & 3)
- Personal and Social Development Records (Chapter 3)
- Career Transition Records (Chapter 4)
- Health History and Services (Chapter 6)
- Administrative Records (Chapter 6)

Each of these areas requires certain documentation that must be contained in the student's personnel file. Additionally, within each area you will also find specific documents that are maintained while the student is still active on the center.

Center operators must establish a system for the maintenance of ongoing records for each student during enrollment and for the transfer and disposal of such records after termination. This system should be organized in such a manner that allows for expeditious retrieval of documents and information for any student.

CIS allowed for a shift to greater accessibility to student data by more staff via an electronic format. While electronic files are quickly becoming the public norm, the need for hard copies of student data is still required. This supplement should be used to guide centers and operators as to what should be found in all students' records, both active and terminated.

Procedure: Activities and accomplishments shall be documented in CIS immediately upon verification while the student is actively enrolled on the center. Centers may also opt to record student achievements in their own operating system (i.e., Data Five, SMS). However, priority shall be given to CIS.

Documents generated during the students' enrollment must be maintained in the appropriate departments. To insure confidentiality, all records must be maintained in a secure manner and kept in places accessible only by lock and key. Paperwork regarding accomplishments shall be maintained in the individual departmental files until separation.

Once separated, the content of the files should be purged based on document importance. The contents must then be assembled into one student personnel folder. Exceptions to this requirement include counseling and medical folders. Counseling folders must be maintained in a separate secured location to insure confidentiality of the contents. These records must be destroyed 6 months after the student's date of separation. Terminated student records must be stored separately from the active student records at all times. Centers are required to maintain the student personnel folder for no less than 3 years on the center. After 3 years, the records should be mailed to the Federal Records Center.

Job Corps Centers shall comply with the following procedures regarding the maintenance and organization of center files.

- **a.** <u>Career Preparation and Career Development:</u> This area encompasses all records referring to the students' academic and vocational achievements. PRH references include:
- **4** 3.2 Administration and Management of Career Development Services
- 4 3.7 Work Based Learning
- 4 3.8 Reading
- 3.9 Communication Skills
- **4** 3.10 Mathematics

- 4 3.11 High School Diploma and GED Certificate
- **4** 3.12 English as a Second Language
- **4** 3.13 Vocational Training
- **4** 3.14 Advanced Career Training
- **♣** 3.23 Driver Education

The majority of this information should be documented in CIS directly by appropriate staff once the student has successfully completed the academic/vocational requirement. Documentation that must be preserved in the hard copy folder includes:

Required Documentation

- 1. TABE scores and answer sheets
- 2. Copy of High School Diploma or GED Certificate
- 3. Training and Achievement Record

Below represents items that are either not required or are found in CIS but can be placed in the student folder at the discretion of the operator.

School transcripts/IEP
Counseling Referrals
Evaluations of Student Progress
Behavior Incident Reports
Educational/Vocational Courts
WBL Applications
Certificates of Recognition
Resume
Job Application
Letters of Recommendation

- **b.** Personal & Social Development Records: This area encompasses all records pertaining to personal, counseling, and residential issues/accomplishments. However, due to the personal nature of these files, each area will be addressed separately. PRH references include:
- **4** 2.4 Personal Counseling
- 4 3.3 Personal and Career Counseling
- ♣ 3.4 Student Standards of Conduct
- **4** 3.5 Evaluations of Student Progress
- **4** 3.18 Residential Living
- 4 3.19 Wellness
- **♣** 3.22 Student Government and Leadership

Residential Living Files - Required Documentation

- 1. Basic Identifying information
- 2. Emergency Contacts
- 3. Parental Consent for minors
- 4. Clothing Inventories initial and updates

Below is information that can be included at the discretion of the center operator

Residential Living Agreements
Evaluations of Student Progress
Student Leave forms
Dormitory Court documents
Behavioral Contracts
Incident Reports
Anecdotal notes
Dorm Leadership application
Certificates of Recognition

Counseling Files – Required Documentation

- 1. Record of Individual Counseling Session (R-A-P format for personal counseling)
- 2. Social Intake Form
- 3. Mental Health referrals/reports/documentation
- 4. Admissions Counselor Assessment Tool (ACAT)
- 5. Evaluations of Student Progress
- 6. Student Leave Forms
- 7. Release of Information
- 8. Parental Consent for Minors
- 9. Emergency Contacts
- 10. Behavioral Contracts

Below is information that can be included at the discretion of the center operator and/or is available through CIS

PCDP
Case Notes
AWOL Reports
Anecdotal Records
Attendance Notices
Certificates of Recognition

Student Standards of Conduct - Required Documentation

- 1. JC Student Data Sheet (ETA 6-52)
- 2. Behavioral Contracts
- 3. Positive/Negative Incident Reports
- 4. Investigative Reports
- 5. Student/Staff Volunteer Statements
- 6. Student/Staff Witness Statements
- 7. Center Director's Review Board Decision
- 8. Student Appeal Form

Below is information that can be included at the discretion of the center operator and/or is available through CIS

Signed Zero Tolerance Form Court Information Anecdotal Records

- **Career Transition Records:** This area encompasses records for former enrollees and graduates who have completed the Job Corps program and are receiving transitional and placement services from a Career Transition Services provider. PRH reference includes:
 - 4.5 Documentation, Reporting, and Verification

Operators should utilize different color folders for graduates and former enrollees to allow for easy identification. Items that must be maintained in the hard copy folder include:

Former Enrollees	Graduates		
1. Placement and Assistance	1. Release of Information		
Record (ETA 6-78)	2. Placement and Assistance		
2. Employment Verification	Record (ETA 6-78)		
3. Release of Information	3. Employment Verification		
4. Transition Check Receipt	4. Transition Check Receipt		
5. Employability Kit Checklist	5. Employability Kit Checklist		
Below represents items that are found in CTS but can be placed in the student			
folder at the discretion of the operator.			
Contact Information			
Resume			
Training Achievement Record			
Support Services/Referrals			
Case Notes			
PCDP			
Job Referrals			
Record of Pre-arrival Phone Call			

d. Health History and Services: This area focuses on records requirement pertaining to medical health services obtained on the center. The organization of the medical record should be consistent for each student on the center. Records must include:

Required Documents

- 1. Health Questionnaire (ETA 6-53) (if completed)
- 2. HIPAA Forms (must have original signature)
- 3. Completed medical history and medical examination forms
- 4. All medical records from off center consultants/hospitals
- 5. Dental Records, including x-rays
- 6. TEAP records
- 7. Mental Health records
- 8. All laboratory reports/results
- 9. Chronological records of care provided
- 10. CA-1 Forms
- 11. Copies of medical leave forms
- 12. Signed HIV Information Sheet
- 13. Problems list
- 14. Medication list
- 15. Chart audit form
- **16.** Reasonable Accommodation Forms (once separated)

Contents of reasonable accommodations files should be combined with the students' medical file upon separation and sealed with the other medical records. Active student files should be maintained with the Center Director's Designee in a secured location.

Once a student separates from the program, the above information should be sealed in a single envelope, labeled as the medical records, and placed in the permanent student personnel folder. Files must be maintained on the center for 3 years after date of termination. After 3 years, the records must be retired to the Federal Records Center.

- **e. Administrative Records:** This area focuses on the contents that will be the framework of the student's permanent personnel folder. PRH reference includes:
 - **♣** 5.1 Program Management
- 4 6. 3 Student Records Management

Active Students - Required	Separated Students - Required
1. JC Student Data Sheet (ETA 6-52) 2. OASIS enrollment forms (original signature): • Social Security Card • Birth Certificate/INS Card • Income verification (W-2; pay stub; SSI letter, etc.) • Self-Certification Sheet (if applicable) • Parental Consent form (minors) • Court Check documentation • Selective Service registration (males) • HIV Consent Form • Reasonable Accommodation Form • Admission Counselor's Assessment Tool (ACAT) • Zero Tolerance for Violence and Drugs statement 3. Travel Authorization (ETA 6-28) 4. JC Enrollee Allotment Determination (ETA 6-58) 5. Request for Readmission (ETA 6-60) 6. Record of Clothing Issued and Taxable Transportation (ETA 6-105) 7. Designation of Beneficiary (SF 1152) 8. Personal Contact Form 9. Zero Tolerance for Violence and Drugs Certifications 10. Pay and leave status documentation 11. Parental Consent form for minors 12. Job Corps Consent Form 13. Folder Inventory Form 14. Documents required by center operator **Department specific documents may be maintained in the departmental files until student comprehence presonnel file.	 All documentation required while student in Active status Placement and Assistance Record (ETA 6-78) Health Record (SF 93) (sealed in separate envelope) Copy of official GED certificate (or passing scores)/High School Diploma Notice of Termination (ETA 6-61) Training Achievement Record (TAR) TABE Answer Sheets Documentation supporting disciplinary separation Personal Career Development Plan

must be transferred to the permanent student personnel file.

Active and separated student records must be maintained separately in secured and lockable storage areas. Records should be purged of extraneous information and include only those documents that are required at separation.

Structure of the student files should be consistent for each file. A folder inventory form should accompany each folder and indicate the exact layout of the contents. Information should be stored in chronological order, with the most recent information on top. All documentation should be securely bound to the personnel folder to avoid any potential loss of information.

- **5. Rescissions:** This Instruction supercedes RFI 02-15 of 2/04/02 CTS File Maintenance.
- **6.** <u>Inquiries</u>: Should you have any questions regarding the information contained in this supplement, please contact your Government Authorized Representative.